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Attorneys for Defendant Tenza Trading Ltd.

IN THE UNITED STATES DISTRICT COURT

FOR THE DISTRICT OF OREGON

CALISTA ENTERPRISES LTD, a
Republic of Seychelles Company,

Plaintiff,

v.

TENZA TRADING LTD., a Cyprus
Company,

Defendant.

No. 3:13-cv-01045-SI

JOINT STIPULATED MOTION TO EXTEND
DEADLINES FOR REPLIES TO PARTIES'
SUMMARY JUDGMENT MOTIONS

TENZA TRADING LTD., a Cyprus
Company,

Counterclaim Plaintiff,

v.

CALISTA ENTERPRISES LTD., a
Republic of Seychelles Company; and
ALEXANDER ZHUKOV, A
Czechoslovakian citizen,

Counterclaim Defendants.

Tenza Trading Ltd. (hereafter “Tenza”) and Calista Enterprises, Ltd. (hereafter “Calista”) submit the following stipulated motion.

Local Rule 7.1 Certification

The undersigned counsel certify that the motion at issue is stipulated by counsel.

Motion

The parties request a one-day extension of the currently set deadline for replies to dispositive motions. The reply briefs are currently due on Monday, July 21, 2014. Pursuant to the Court’s order of July 14, 2014 (Dkt. No. 121), Tenza’s Response to Calista’s Motion to Amend Complaint was briefed on a shortened deadline. This change impacted Tenza’s efforts on its reply in support of Tenza’s motion for summary judgment. In addition, lead trial counsel, Paul Tauger, has been, and still is, ill and temporarily incapacitated. As a result, Tenza needs additional time to prepare its reply. Calista has asked that the accommodation similarly extend to its deadline. The parties have stipulated, and hereby respectfully request, that the deadline for replies to dispositive motions be continued one day, to and including Tuesday, July 22, 2014.

Consistent with LR 16-3, this motion is made jointly in good faith and not for purposes of

delay. The requested extension will not require any modifications to any other case management dates that have been set by the Court.

Dated this 18th day of July, 2014.

Respectfully submitted,

s/ Devon Zastrow Newman

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